

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
MICHELLE LO (NYRN 4325163)
Chief, Civil Division
ELIZABETH KURLAN (CABN 255869)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7298
Facsimile: (415) 436-6748
Elizabeth.Kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HASSEN LAARIF,

Plaintiff,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

C 3:23-cv-05380 LJC

**STIPULATION TO EXTEND TIME WITHIN
WHICH DEFENDANTS MUST FILE A
RESPONSE AND ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time within which the Defendants must serve the answer or otherwise respond in the above-entitled action.

Defendants will file their response on or before February 27, 2024.

The parties further request a corresponding extension on the deadline for filing a summary judgment motion under the Court's Immigration Mandamus Procedural Order. Currently, if Plaintiff has not filed a motion for summary judgment by 90 days after the Complaint was filed, or January 18, 2024, Defendants must file a motion for summary judgment by 120 days after the Complaint was served, or February 27, 2024. In light of the agreed-upon extension for Defendants' response to the Complaint, the parties request that, if Plaintiff has not filed a motion for summary judgment by March 18, 2024, Defendants must file their motion for summary judgment by April 27, 2024. In accordance

1 with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur
2 in the filing of this document.

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4 Dated: December 29, 2023

Respectfully submitted,

5 ISMAIL J. RAMSEY
6 United States Attorney

7 /s/ Elizabeth D. Kurlan
8 ELIZABETH D. KURLAN
9 Assistant United States Attorney
Attorneys for Defendants

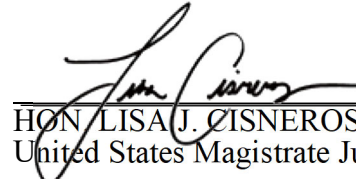
10 Dated: December 29, 2023

11 /s/ Ghassan Shamieh
12 GHASSAN SHAMIEH
13 Shamieh, Shamieh, & Ternieden
14 Attorney for Plaintiff

15 **ORDER**

16 Pursuant to stipulation, IT IS SO ORDERED.

17 Date: December 29, 2023

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19 HON. LISA J. CISNEROS
20 United States Magistrate Judge
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DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On October 20, 2023, Plaintiff filed a complaint in which they bring a mandamus action seeking adjudication of their Form I-589, Application for Asylum and Withholding of Removal. *See* Dkt. No. 1. Our office was served with the complaint on October 30, 2023.

3. On December 27, 2023, I contacted Plaintiff regarding Defendants' request for an extension of time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: December 29, 2023

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney